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May 22, 2020

Hon. John Michael Vazquez, U.S.D.C.J.
50 Walnut St.
Newark, N.J. 07102

Re: United States v. Melissa Reynolds
Docket No.: 2:18-cr-00687

Dear Judge Vasquez:

This firm represents Ms. Reynolds, the Defendant in the above captioned matter. The Court previously adjourned Ms. Reynolds's surrender date to June 1, 2020 due to the coronavirus epidemic. Kindly accept this letter brief in lieu of a more formal request to adjourn the June 1, 2020 surrender date.

Unfortunately, the Coronavirus epidemic is still growing in the United States. According to the CDC website, there are now over 1,500,000 cases and over 90,000 deaths in the United States alone. Most government and educational websites are reporting an additional 20,000 to 25,000 new cases each day. Worldwide, according to the World Health Organization, more new infections were reported on May 20, 2020 than any other previous day.

We have previously submitted to the court the certifications/affidavits of various infectious disease experts who opined that the environment inside a correctional institution is especially ripe for virus spread.

According to a recent news report, the Danbury facility which Ms. Reynolds would surrender to, has been especially hit hard by the coronavirus. According to a local Connecticut newspaper, sixty inmates and fifty staff members were stricken with the virus and one inmate has died (See Exhibit 1).

Of note, the Hon. Michael P. Shea, U.S.D.C.J. noted that petitioners presented evidence showing that social distancing in the Danbury facility is nearly impossible. The women's satellite prison are housed in a single dorm room that accommodates approximately 160-170 beds. The women share three bathrooms, each of which includes 4-8 toilets, sinks and showers. The women's satellite prison housed 131 inmates.

The women's camp is a large building divided into four dorms consisting of cubicles and bunk beds. The cubicles have no doors and their dividing walls do not extend to the ceilings. The bunk beds are less than six feet apart. Each of the four dormitories has a common shower and bathroom area. Three of the dorms house 47 women each and the fourth houses seven. As of May

4, 2020, the women's camp housed 134 inmates (Page 9 of the decision affixed as Exhibit 6).

Based on these representations, Judge Shea concluded that "true social distancing appears to be unachievable at FCI Danbury, creating an environment where the risk of transmission is significantly heightened." (Page 10 of the decision affixed as Exhibit).

There is increased concern for Ms. Reynolds due to her pre-existing history of hypertension and having African American ancestry (See Exhibit2). As the court is no doubt aware, African Americans are especially vulnerable to Covid-19 and have suffered disproportionately from its effects as compared to the general population.

Since the government mandated shutdown, Ms. Reynolds has served the community on the frontlines as a healthcare worker. She has requested to volunteer with the New Jersey Department of Health on March 24, 2020 (See Exhibit 3). She also volunteered at the Javits Center call center in New York from April 7, 2020 to April 30, 2020 (See Exhibit 4).

Ms. Reynolds has also worked at the NYC Health and Hospitals System since April 13, 2020 in the Bronx at the Jacobi Medical Center (See Exhibit 5). Covid-19 is most prevalent in

the five boroughs like the Bronx, many of whose residents reside in under-represented communities.


Ms. Reynolds has risked her life to help others during this pandemic and she continues to do so. However, unlike working at Hospitals where she is provided with PPE, she will not be provided with any PPE once in Danbury and she will be in a petri dish-like environment where spread is inevitable.¹

The undersigned have admired Ms. Reynolds's dedication to others during this pandemic. While most of us work remotely, Ms. Reynolds goes to the new "ground zero" on a daily basis in the Bronx. It is respectfully requested that the court adjourn Ms. Reynolds's surrender date until Spring 2021, past the so called expected "second wave."

¹ Ms. Reynolds recently took a test for antibodies which came back negative (Exhibit 5).

The government does not consent to the request to adjourn the surrender date. We thank the court for its consideration of this request.

Respectfully submitted,



Robert J. DeGroot, Esq.
Oleg Nekritin, Esq.

cc: Joyce Malliet, A.U.S.A.

IT IS ON THIS 27th DAY OF May, 2020 ORDERED that the Defendant's surrender date is adjourned to April 30, 2021.



Hon. John Michael Vazquez, U.S.D.C.J.